

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

**MATTHEW DICKSON and JENNIFER DICKSON,
Individually and on behalf of all others similarly
situated**

PLAINTIFFS

v.

No. 5:16-CV-5027 PKH

**GOSPEL FOR ASIA, INC.,
GOSPEL FOR ASIA-INTERNATIONAL,
K.P. YOHANNAN, GISELA PUNNOSE,
DANIEL PUNNOSE, DAVID CARROLL,
and PAT EMERICK**

DEFENDANTS

**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY BRIEF
IN SUPPORT OF THEIR MOTION TO COMPEL ARBITRATION
AND TO STAY PROCEEDING PENDING ARBITRATION**

Pursuant to Local Rule 7.2, defendants Gospel for Asia, Inc., Gospel for Asia-International,¹ K.P. Yohannan, Gisela Punnose, Daniel Punnose, David Carroll, and Pat Emerick (“Defendants”) move the Court for leave to file a reply brief in support of their Motion to Compel Arbitration and to Stay Proceeding Pending Arbitration (“Motion to Compel Arbitration”). In support of this motion, Defendants state that:

1. On April 15, 2016, Defendants filed their Motion to Compel Arbitration and their Brief in Support. [Docs. 23 and 24].
2. On April 29, 2016, plaintiffs filed an opposition to the motion. [Doc. 31].
3. In order to inform the Court fully and to address issues raised in the opposition, Defendants request leave to file a reply brief in support of their motion.
4. Defendants’ reply brief will assist the Court in resolving the motion, will not prejudice plaintiffs, and will not cause undue delay.

¹ Gospel for Asia-International does not currently exist.

5. Defendants request that they be granted until and through May 10, 2016, to file a reply brief in support of their motion.

WHEREFORE, Defendants Gospel for Asia, Inc., Gospel for Asia-International, K.P. Yohannan, Gisela Punnose, Daniel Punnose, David Carroll, and Pat Emerick pray that the Court grant this motion and permit them to file a reply brief in support of their motion to Compel Arbitration.

DATED: May 2, 2016.

SHULTS & BROWN, LLP
200 West Capitol Avenue, Suite 1600
Little Rock, AR 72201-3637
(501) 375-2301

By: /s/ Debra K. Brown
Debra K. Brown, Ark. Bar No. 80068
dbrown@shultslaw.com

Steven Shults, Ark. Bar No. 78139
sshults@shultslaw.com

Harriet E. Miers (*Pro hac vice*)
hmiers@lockelord.com
Robert T. Mowrey (*Pro hac vice*)
rmowrey@lockelord.com
Paul F. Schuster (*Pro hac vice*)
pschuster@lockelord.com
Jason L. Sanders (*Pro hac vice*)
jsanders@lockelord.com
LOCKELORD LLP
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201-6776
(214) 740-8000

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that, on May 2, 2016, I electronically filed Defendants' Motion for Leave to File Reply Brief in Support of Their Motion to Compel Arbitration and To Stay Proceeding Pending

Arbitration with the Clerk of the Court, to be served by operation of the Court's electronic filing system on the attorneys of record.

/s/ Debra K. Brown

Debra K. Brown